

REMARKS

1. In response to the Office Action mailed July 22, 2005, Applicant respectfully requests reconsideration. Claims 21-53 were last presented for examination. In the outstanding Office Action, all claims were rejected. No claims have been amended, canceled or added. Thus, upon entry of this paper, claims 21-53 will remain pending in this application. Of these thirty-three (33) claims, three (3) claims (claims 21, 26, and 41) are independent. Based on the following Remarks, Applicant respectfully requests that all outstanding rejections be reconsidered, and that they be withdrawn.

Art of Record

2. Applicant acknowledges receipt of form PTO-892 identifying additional references made of record by the Examiner.

Claim Rejections Under 35 USC 103(a)

3. Independent claims 21, 26, and 41 and dependent claims 22-25, 27, 28, 30, 32, 37, 38, 42, 43, 45, 47, 52, and 53 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,434,629 B1 to Lim, *et al.* (hereinafter, “Lim”) in view of U.S. Patent No. 2002/0157023 A1 to Callahan, *et al.* (hereinafter, “Callahan”). Dependent claims 29, 39 and 44 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Lim and Callahan, in further view of U.S. Patent No. 2002/0053020 A1 to Teijido, *et al.* (hereinafter, “Teijido”). Dependent claims 23-25, 31, 33-36, 46 and 48-51 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Lim and Callahan, in further view of U.S. Patent No. 6,275,225 to Rangarajan, *et al.* (hereinafter, “Rangarajan”). Based upon the following Remarks, Applicant respectfully requests reconsideration and withdrawal of these rejections.

4. First, the Examiner has failed to address the entire limitations of certain claims in contravention of MPEP §2143.03. In order to establish a *prima facie* case of obviousness all claims limitations must be taught or suggested by the prior art. MPEP §2143.03. For example, the Examiner has apparently failed to consider the entire limitation as recited in claim 21. For this reason alone, the Office Action is improper and should be withdrawn.

5. Independent claim 21 recites, in part, “applying a display filter to resources of the service provider network not excluded by said security filter.” The Examiner apparently

recognized that Lim does not disclose a multi-filter system comprising a display filter operating on network resources not excluded by a security filter and therefore left out the words “not excluded by said security filter” from the claim limitation. (*See*, Office Action at pg. 3.)

6. Lim, however, as apparently recognized by the Examiner, does not teach or suggest applying both a display filter and a security filter. Instead, the Examiner has merely alleged that Lim discloses a display filter and instead relies on Callahan for allegedly disclosing a security filter. (*See*, Office Action, para. 6.)

7. Even if the Examiner were correct and Callahan discloses a security filter, Callahan, like Lim, fails to disclose a multi-filter system in which both a display filter and a security filter are applied, let alone applying a display filter to resources not excluded by a security filter. As such, neither Callahan nor Lim disclose the limitation of claim 21 of “applying a display filter to resources of the service provider network not excluded by said security filter.”

8. Additionally, Applicant respectfully disagrees with the Examiner’s reliance on Callahan as allegedly disclosing a security filter as recited in claim 21. Callahan discloses a system using a “semantic firewall to limit the access a customer has to data.” (*See*, Callahan, paragraph 0052.) In support of the Examiner’s rejection, the Examiner relied on the “authenticate filter” of Callahan. (*See*, Office Action at para. 6.) This “authenticate filter,” however, does not “specify the network resources of a partitioned network allocated to that customer,” as recited in claim 21. Instead, the “authenticate filter” of Callahan is described as being used to authenticate a user to determine whether a request from the user is authentic and may be handled by the firewall filters. (*See*, Callahan at paragraph 0089.) Callahan describes that a user is authenticated by checking a user’s sign-in login and password. (*See*, Callahan at paragraph 0068.) Thus, the authentication filter does not “specify the network resources of a partitioned network allocated to a user” as claimed. Instead, this authentication filter simply verifies a user’s login name and password to determine whether a request from the user is authentic.

9. Applicant therefore respectfully submits that Callahan fails to teach or suggest “a security filter … corresponding to the customer and specifying the network resources of a partitioned network allocated to that customer...,” as recited in claim 21. As such, Applicant

respectfully requests that the Examiner reconsider and withdraw the rejection for at least this additional reason.

10. Additionally, claim 21 recites that the security filter is “definable by service provider and not the customer....” The authentication filter of Callahan, however, merely verifies a user’s log-in name and password, which are presumably specified by the user and not defined by the service provider. As such, Applicant respectfully submits that claim 21 is allowable over the cited references for at least this additional reason.

11. Applicants further submit that the Examiner has also failed to establish a *prima facia* case of obviousness for the additional reason that the Examiner has failed to establish a proper motivation to combine the Lim and Callahan references. In the rejection of claim 21, the Examiner asserted that one would have been particularly motivated to incorporate Callahan’s cascading filtering implementation into Lim’s management system to provide a level of security in the management of network transactions because Lim suggests the use of authentication procedures in a data accessing system. (*See*, Office Action, pg. 3-4). Applicant respectfully disagrees.

12. The Examiner improperly asserts that Lim discloses authentication means and then applying appropriate filters after the user has been authenticated. (*See*, Office Action, pg. 3). However, as discussed above, Lim completely fails to teach or suggest a security filter that filters network resources. Lim merely teaches the generic and well-known authentication means in which userIDs are used to access portions of an online directory shared by several users, in an attempt to prevent a user from obtaining the information of other users. (*See*, Lim, col. 9, lns. 11-27.) Furthermore, “the appropriate filters” cited in the Office Action are not related to security filters in any way. (*See*, Lim, col. 10, lns. 43-59.) This mere disclosure of generic authentication means would not motivate one of ordinary skill in the art to combine Lim’s management system with a security filter that filters network resources.

13. Similarly, Callahan provides no motivation to combine Lim’s management system with a security filter that filters network resources. Callahan merely teaches the use of a “semantic firewall” to restrict user access to the network. (*See*, Callahan, paragraph 0052.) In fact, Callahan fails to teach or suggest the use of display filters or security filters. Thus, because the Office Action has not shown how Lim, with no suggestion of security filters, or Callahan, with no suggestion of display filters or security filters, would motivate a person

with ordinary skill in the art to combine the two references, the rejection of claim 21 based on Lim in view of Callahan is improper and should be withdrawn.

14. Claim 26 recites, in part, "displaying a portal display of on-line service information generated from application of one of said plurality of modules to network resources resulting from application to the service provider network of a security filter corresponding to the customer and at least one of said display filters." As such, Applicant respectfully submits that for at least reasons similar to those discussed above, independent claim 26 is likewise allowable over the cited references.

15. Claim 41 recites, in part, "a display manager configured to construct a portal display of on-line service information resulting from an application of selected module to a network resource of said service provider network of resulting from application of a security filter." As such, Applicant respectfully submits that for at least reasons similar to those discussed above, independent claim 41 is likewise allowable over the art of record.

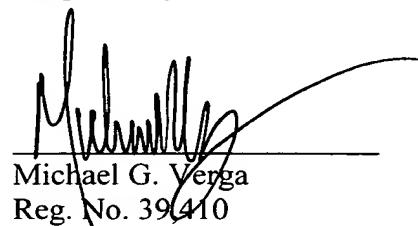
16. Additionally, Applicant respectfully submits that Teijido and Rangarajan, which were also cited by the Examiner, do not cure, nor has the Examiner alleged that they cure, the above-discussed deficiencies of Lim and Callahan.

17. The dependent claims incorporate all of the subject matter of their respective independent claims and add additional subject matter which makes them a *fortiori* and independently patentable over the art of record. Accordingly, Applicant respectfully assert that the dependent claims are patentable over the art of record at least for the same reasons as those noted above.

Conclusion

18. In view of the foregoing, this application should be in condition for allowance. A notice to this effect is respectfully requested.

Respectfully submitted,



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